

FILED  
at 4:45 o'clock P.M.  
JUL 01 2019

CAUSE NO. CV51385

KENDRA CHARBULA  
DISTRICT CLERK WHARTON CO. TEXAS  
By Deputy

CLARK, LOVE & HUTSON, PLLC,  
Plaintiff

IN THE DISTRICT COURT OF

v.

WHARTON COUNTY, TEXAS

JAMES M. BEGGS; LYNDA LANDERS;  
AND BEGGS LANDERS LAW FIRM, PLLC

Defendants

23RD JUDICIAL DISTRICT

**ORDER GRANTING PLAINTIFF'S MOTION FOR EXPEDITED DISCOVERY**

The Court, having considered Plaintiff's Motion for Expedited "Level 3" Discovery, the circumstances of this case and the pleadings on file in this matter, makes the following orders for expedited discovery in this case:

1. Plaintiff may take the oral deposition of Defendant, and a corporate representative of Beggs Landers Law Firm, PLLC on subjects limited to the temporary injunction application including (a) the allegation that Defendants misappropriated Plaintiff's trade secrets, (b) the allegation that Defendants engaged in tortiously interfering solicitations that violated the Texas Disciplinary Rules of Professional Conduct, and (c) other matters directly pertinent to the claim for a temporary injunction, by providing the deponent and his or its counsel five (5) calendar days' written notice of the date of the deposition.
2. Plaintiff may propound ten (10) Requests for Production of Documents pursuant to Rule 196, and ten (10) Interrogatories pursuant to Rule 197.
3. Defendants must object and respond to the limited Requests for Production of Documents and the limited Interrogatories within five (5) calendar days of service.
4. Plaintiff may propound Request for Disclosures pursuant to Rule 194, which the recipient party must respond to within five (5) calendar days of service.
5. The automatic stay provisions of TEX.R.CIV.P. 199.4 do not apply.

**EXHIBIT 3**

6. The discovery authorized herein shall be the exclusive discovery procedures available to the parties prior to the Temporary Injunction hearing ("Hearing") at this time. If either party desires to conduct additional discovery prior to the Hearing, they shall discuss the issue in good faith. If that does not resolve the matter, the party seeking additional discovery may petition the Court for emergency relief.

SO ORDERED.

SIGNED this 1 day of July, 2019. at 4:45 pm

Bm Hart.  
JUDGE PRESIDING